

April 15, 2002

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: In the Matter of)
Year 2000 Biennial Regulatory Review) **WT Docket 01-108**
--Amendment of Part 22 of the Commission's)
Rules to Modify or Eliminate Outdated Rules)
Affecting the Cellular Radiotelephone Service)
And Other Commercial Mobile Radio Services)

Dear Mr. Caton:

Pursuant to Section 1.1206 of the Commission's rules, William L. Ball, Vice President Public Policy, representing the OnStar Corporation, submits this notice in the above-captioned proceeding of an ex parte meeting on April 15, 2002, with Commissioner Kathleen Q. Abernathy and Bryan Tramont, Senior Legal Advisor to the commissioner. The purpose of the meeting was to demonstrate the operation of the OnStar System and present OnStar's views on issues associated with the above captioned matter.

It was explained that OnStar combines cellular communications with GPS technology and integrates them onto the electrical architecture of the vehicle. OnStar's service offerings were reviewed including demonstration of OnStar Personal Calling, Virtual Advisor and call center services including remote door unlock. It was noted that OnStar is currently an analog based service. More specifically it was noted that analog is the state-of-the-art for the transmission of data and voice on the same call because there is currently no standard or robust method in digital networks to discriminate between data and voice on the same call.¹ This capability is required in offering automatic airbag deployment notification, emergency and other location-based services that are the cornerstone of OnStar's telematics offering. It was suggested that in evaluating the analog compatibility standard, the Commission should consider particularly the ability of the current and subsequent owners of the analog fleet of vehicles to continue to secure service.

¹ This issue is described in more detail in the July 2, 2001 comments, August 1, 2001 reply comments and ex parte of March 28, 2002 filed by OnStar in FCC Docket No. WT 01-108.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

William L. Ball
Vice President, Public Policy

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